

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC DIGOXIN AND
DOXYCYCLINE ANTITRUST LITIGATION**

**THIS DOCUMENT RELATES TO:
ALL ACTIONS**

**MDL NO. 2724
16-MD-2724**

HON. CYNTHIA M. RUFFE

JOINT STATUS REPORT

Per the September 8, 2016 Case Management Conference in the above-referenced matter, End-Payer Plaintiffs, Direct-Purchaser Plaintiffs, and all Defendants (the “Parties”) respectfully submit this Status Report and a Joint Proposed Pretrial Order No. 5 for the Court’s consideration, attached hereto as Exhibit A. The Parties have reached agreement on, and the Joint Proposed Order addresses: (1) the timing for filing of the Consolidated Class Action Complaints (“CCACs”) by each plaintiff group; (2) the timing for motions regarding and answers to the CCACs; (3) the timing for negotiation and submission of discovery-related protocols; and (4) a provision regarding service and service of process.

The Parties have been unable to reach agreement on the appropriateness, timing and potential scope of discovery prior to adjudication of any motions to dismiss that will be filed and all Parties have reserved their rights on that issue.

Dated: November 2, 2016

Respectfully submitted by:

<p>Terry M. Henry (Pa. I.D. No. 77455) BLANK ROME LLP One Logan Square Philadelphia, PA 19103 Tel.: (215) 569-5500 Fax: (215) 832-5793 E-mail: THenry@blankrome.com</p> <p>Steven C. Sunshine Tiffany Rider Timothy Grayson SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 1440 New York Ave, NW Washington, DC 20005 Telephone: (202) 371-7329 steve.sunshine@skadden.com tiffany.rider@skadden.com timothy.grayson@skadden.com</p> <p>Karen Hoffman Lent SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 4 Times Square New York, NY 10038 Telephone: (212) 735-3000 karen.lent@skadden.com</p> <p><i>Attorneys for Defendant Allergan plc & Actavis, Inc., and Actavis Holdco U.S., Inc.</i></p>	<p><i>/s/ Jan P. Levine</i> Jan P. Levine (<i>Defendants' Liaison Counsel</i>) PEPPER HAMILTON LLP 3000 Two Logan Square Eighteenth & Arch Streets Philadelphia, PA 19103-2799 Telephone: (215) 981-4000 Fax: (215) 981-4750 levinej@pepperlaw.com</p> <p>Barbara Mather Robin P. Sumner Michael J. Hartman PEPPER HAMILTON LLP 3000 Two Logan Square Eighteenth & Arch Streets Philadelphia, PA 19103-2799 Telephone: (215) 981-4000 Fax: (215) 981-4750 matherb@pepperlaw.com sumnerr@pepperlaw.com hartmanm@pepperlaw.com</p> <p>Keith J. Harrison Shari Ross Lahlou CROWELL & MORING LLP 1001 Pennsylvania Avenue, NW Washington, D.C. 20004-2595 Tel. (202) 624-2500 Fax. (202) 624-5116 kgardiner@crowell.com kharrison@crowell.com slahlou@crowell.com</p> <p><i>Attorneys for Defendant West-Ward Pharmaceuticals Corp.</i></p>
<p>Chul Pak Jeffrey C. Bank WILSON SONSINI GOODRICH & ROSATI, PC 1301 Avenue of the Americas, 40th Floor New York, NY 10019-6022 Telephone: (212) 999-5800 cpak@wsgr.com jbank@wsgr.com</p>	<p>William M. Connolly Chanda A. Miller DRINKER BIDDLE & REATH LLP One Logan Square, Ste. 2000 Philadelphia, PA 19103 Tel. (215) 988-2700 Fax. (215) 988-2757 william.connolly@dbr.com chanda.miller@dbr.com</p>

<p>Seth C. Silber Kellie M. Kemp WILSON SONSINI GOODRICH & ROSATI, PC 1700 K Street NW, Floor 5 Washington, DC 20006-3817 Telephone: (202) 973-8800 ssilber@wsgr.com kkemp@wsgr.com</p> <p><i>Attorneys for Defendant Mylan, Inc. and Mylan Pharmaceuticals, Inc.</i></p>	<p>Stephen D. Brody Edward D. Hassi O'MELVENY & MYERS LLP 1625 Eye Street, N.W. Washington, DC 20006 Telephone: (202) 383-5300 Fax: (202) 383-5414 sbrody@omm.com ehassi@omm.com</p> <p><i>Attorneys for Defendant Par Pharmaceutical Companies, Inc.</i></p>
<p>Paul M. Thompson (Pa. I.D. No. 82017) Raymond A. Jacobsen, Jr. Emre N. Ilter Lisa A. Peterson MCDERMOTT WILL & EMERY LLP 500 North Capitol Street, NW Washington, DC 20001 Telephone: (202) 756-8000 Fax: (202) 756-8087 pthompson@mwe.com rjacobsen@mwe.com ilter@mwe.com lpeterson@mwe.com</p>	<p>J. Douglas Baldridge Lisa Jose Fales Danielle R. Foley VENABLE LLP 575 7th Street, NW Washington, DC 20004 202-344-4703 Fax: 202-344-8300 jdbaldridge@venable.com ljfales@venable.com drfoley@venable.com</p>
<p>David L. Hanselman, Jr. MCDERMOTT WILL & EMERY LLP 227 West Monroe Street Chicago, IL 60606 Telephone: (312) 372-2000 Fax: (312) 984-7700 dhanselman@mwe.com</p>	
<p>Nicole L. Castle MCDERMOTT WILL & EMERY LLP 340 Madison Avenue New York, NY 10173 Telephone: (212) 547-5480 Fax: (212) 547-5444 ncastle@mwe.com</p> <p><i>Attorneys for Defendant Impax Labs., Inc.</i></p> <p style="text-align: center;"><i>Counsel for Defendants</i></p>	
<p><i>Attorneys for Defendant Sun Pharmaceutical Industries, Inc.</i></p>	

<p>Alexandra S. Bernay ROBBINS GELLER RUDMAN & DOWD LLP 655 West Broadway, Suite 1900 San Diego, CA 92101-8498 Telephone: (619) 231-1058 Fax: (619) 231-7423 Email: xanb@rgrdlaw.com</p> <p><i>Counsel for End-Payer Plaintiff NECA-IBEW Welfare Trust Fund</i></p>	<p>Bonny E. Sweeney HAUSFELD LLP 600 Montgomery Street, Suite 3200 San Francisco, CA 94111 Tel: (415) 633-1908 Fax: (415) 358-4980 Email: bsweeney@hausfeld.com</p> <p><i>Counsel for End-Payer Plaintiff International Union of Operating Engineers Local 30 Benefits Fund</i></p>
<p>Gregory S. Asciolla LABATON SUCHAROW LLP 140 Broadway New York, NY 10005 Tel: (212) 907-0700 Email: gasciolla@labaton.com</p> <p>Roberta D. Liebenberg (<i>EPP Liaison Counsel</i>) FINE, KAPLAN AND BLACK, R.P.C. One South Broad Street, 23rd floor Philadelphia, PA 19107 Tel: (215) 567-6565 Email: rliebenberg@finekaplan.com</p> <p><i>Counsel for End-Payer Plaintiffs Tulsa Firefighters Health and Welfare Trust and UFCW Local 1500 Welfare Fund</i></p>	<p>Heidi M. Silton LOCKRIDGE GRINDAL NAUEN P.L.L.P. 100 Washington Avenue S., Suite 2200 Minneapolis MN 55401 Tel: (612) 339-6900 Fax: (612) 339-0981 Email: hmsilton@locklaw.com</p> <p><i>Counsel for End-Payer Plaintiffs Minnesota Laborers Health and Welfare Fund and Twin Cities Pipe Trades Welfare Fund</i></p>
<p>Cadio Zirpoli SAVERI & SAVERI, INC. 706 Sansome Street San Francisco, CA 94111 Tel: (415) 217-6810 Fax: (415) 217-6813 Email: cadio@saveri.com</p> <p><i>Counsel for End-Payer Plaintiff Edward Carpinelli</i></p>	<p>Mindee J. Reuben LITE DEPALMA GREENBERG, LLC 1835 Market Street, Suite 2700 Philadelphia, PA 19103 Tel: (267) 314-7980 Fax: (973) 623-0858 Email: mreuben@litedepalma.com</p> <p><i>Counsel for End-Payer Plaintiff Nina Diamond</i></p>
<p>Jayne A. Goldstein (Pa. ID No. 48048) POMERANZ LLP 1792 Bell Tower Lane, Suite 203 Weston, FL 33326 Telephone: (954) 315-3454</p>	<p>Marc H. Edelson, Esq. EDELSON & ASSOCIATES, LLC 3 Terry Drive, Suite 205 Newtown, PA 18940 Tel: (215) 867-2399</p>

jagoldstein@pomlaw.com <i>Counsel for End-Payer Plaintiff Fraternal Order of Police, Miami Lodge 20, Insurance Trust Fund</i>	Fax: (267) 685-0676 Email: medelson@edelson-law.com <i>Counsel for End-Payer Plaintiff Philadelphia Federation of Teachers Health and Welfare Fund</i>
Steven Williams COTCHETT, PITRE & McCARTHY, LLP 840 Malcolm Road Burlingame, CA 94010 Telephone: (650) 697-6000 Fax: (650) 697-0577 Email: swilliams@cpmlegal.com <i>Counsel for End-Payer Plaintiffs United Food and Commercial Workers and Employers Arizona Health and Welfare Trust and Unite Here Health</i>	Lisa Saveri SAVERI & SAVERI, INC. 706 Sansome Street San Francisco, CA 94111 Tel: (415) 217-6810 Fax: (415) 217-6813 Email: lisa@saveri.com <i>Counsel for End-Payer Plaintiff Otis McCrary</i>
Thomas H. Burt WOLF HALDENSTEINI ADLER FREEMAN & HERZ LLP 270 Madison Avenue New York, NY 10016 Telephone: (202) 545-4600 Fax: (202) 545-4653 burt@whafh.com <i>Counsel for End-Payer Plaintiff Plumbers & Pipefitters Local 33 Health and Welfare Fund</i>	Lee Albert GLANCY PRONGAY & MURRAY LLP 122 East 42 nd Street, Suite 2920 New York, NY 10168 Telephone: (212) 682-5340 Fax: (212) 884-0988 Email: lalbert@glancylaw.com <i>Counsel for End-Payer Plaintiff Plumbers & Pipefitters Local 178 Health and Welfare Fund</i>
Terry Gross GROSS BELSKY ALONSO LLP One Sansome Street, Suite 3670 San Francisco, CA 94104 Telephone: (415) 544-0200 Fax: (415) 544-0201 terry@gba-law.com <i>Counsel for End-Payer Plaintiff Valerie Velardi</i>	
<i>Counsel for End-Payer Plaintiffs</i>	

<p>Thomas M. Sobol HAGENS BERMAN SOBOL SHAPIRO LLP 55 Cambridge Parkway, Suite 301 Cambridge, MA 02142 Tel. (617) 482-3700 Fax. (617) 482-3003 Email: tom@hbsslaw.com</p> <p><i>Among Counsel for Direct Purchaser Plaintiff Ahold USA, Inc.</i></p>	<p>Dianne Nast NAST LAW LLC 1101 Market Street, Suite 2801 Philadelphia, PA 19107 Tel: (215)-923-9300 Fax: (215) 923-9302 dnast@nastlaw.com</p> <p><i>DPP Liaison Counsel</i></p>
<p>Michael L. Roberts ROBERTS LAW FIRM, P.A. 20 Rahling Circle Mailing Address: P.O. Box 241790 Little Rock, AR 72223 Tel. (501) 821-5575 Fax. (501) 821-4474 mikeroberts@robertslawfirm.us</p> <p><i>Among Counsel for Direct-Purchaser Plaintiff KPH Healthcare Services, Inc. a/k/a Kinney Drugs</i></p>	<p>Linda P. Nussbaum NUSSBAUM LAW GROUP 1211 Avenue of the Americas, 40th Floor New York, NY 10036 Tel. (917) 438-9102 lnussbaum@nussbaumpc.com</p> <p><i>Among Counsel for Direct-Purchaser Plaintiff César Castillo Inc.</i></p>
	<p>David F. Sorensen BERGER & MONTAGUE, P.C. 1622 Locust street Philadelphia, PA 19103 Tel: (215) 875-3000 Fax: (215) 875-4604 Email: dsorensen@bm.net</p> <p><i>Among Counsel for Direct Purchaser Plaintiff Rochester Drug Co-operative, Inc.</i></p>
<p><i>Counsel for Direct-Purchaser Plaintiffs</i></p>	